



Enable Wellness Consultancy  
wellbeing matters

## **PRIVACY NOTICE: DATA PROTECTION**

### **Why do we need to process information about you?**

In providing you with our services, Enable Wellness Consultancy will need to handle your personal information. Personal information is details about you from which you can be identified, such as your name and contact details. Depending on what services you receive from us, we may process additional sensitive data such as information about your health. This information is essential to inform, facilitate and provide assessment and therapeutic services which are appropriate to your individual needs. Under the requirements of the Health Care Professions Council (HCPC) and British Psychological Society (BPS), Enable Wellness Consultancy are obliged, according to the legitimate interests of provision of our services, to keep documentation of your personal data to allow us to provide assessment and therapy services to you.

### **What information will you hold?**

Information about you will be held in the form of written notes, emails, questionnaires, and letters, in addition to our practice management software system and invoices. This information could be collected at any point during your contact with us and/or during your receipt of services from us. Your information will be collected, managed and stored solely for the purposes of us providing you with psychological services or training.

### **How do we use the information that we collect?**

We use the information we collect:

- To communicate with you so that we can inform you about your appointments with us, we use your name, your contact details such as your telephone number, email address or postal address;
- To deliver the correct service to you, we use your name, your contact details and the details about your requirements;
- To create your invoice using our accounting package, we use your name and may use your email address;
- To process your payment, we use your name and your payment card details;
- To register any service you purchase from us, so that it is covered under guarantee, we use your name, telephone number, email and postal address;
- To optimise our website so that users can find the information they need.

### **Where do we keep the information?**

We keep your information in the stores described below. Please note that we do not store your payment card details in any of our systems; these are passed straight through to our payment provider.

#### *On our company computers*

We use personal computers that are located on our business premises. The computers are password protected and the hard drives are encrypted. Passwords are changed regularly and are not shared beyond those who need access to a given computer. Where cloud services are used, these meet GDPR requirements and all data is securely encrypted when stored there.

#### *Your client record*

We use WriteUpp Practice Management Software which is a computer program that stores the information on a computer in our office. We also record some aspects of our interaction with you in Microsoft Excel Spreadsheets on a computer in our office.

#### *In our practice management / accounts package*

We use Wave Financial (waveapps.com) Practice Management Software and MS Excel to manage your account. The company that provides Wave Financial (waveapps.com) software has stated that they are compliant with GDPR.

#### *As a paper copy*

We may take hand written / electronic notes when we meet you. These notes may be used to create part of the services that we provide to you, or to an approved third party (i.e. your insurer or GP). Mostly, however, our written notes serve simply as an aide memoire for your therapist and are transferred onto our electronic database, and the paper copy securely shredded. We keep any confidential papers and any invoices in locked filing cabinets in our offices.

### **How long will you store my information for?**

We will hold information about you for as long as you receive services from us and for seven (7) years following the date of our last contact with you. If our identified client is a minor, we will hold information about the services that we have provided to them for seven years past the age of majority. Paper-based information will be electronically scanned and stored shortly after the point your case file is closed to the service (usually defined as your last appointment). Once scanned, paper-based information will be shredded and disposed of in a confidential way. Electronically held files will be securely stored and deleted after seven years (or if a minor, when they reach the age of majority plus seven years).

You also have the right to ask for your information we hold about you to be erased prior to this time by contacting our Data Protection Officer, Simona Stokes, Managing Director at our main office (Birmingham), or via email to: [simona.stokes@enablewellnessconsultancy.co.uk](mailto:simona.stokes@enablewellnessconsultancy.co.uk) However, if you want to have your data removed, we do have to determine if we need to keep the data. For example, if there is an on-going legal matter related to your case or if your request falls within the timeframe that our governing practice body has a requirement that we hold data for (around seven years). In this instance, we may not be able to erase your data before that time has passed or any court action is ended.

### **How can I access the information you hold?**

You can ask to access the information we hold by writing to our Data Protection Officer, Simona Stokes, at our main office (Birmingham), or via email to [simona.stokes@enablewellnessconsultancy.co.uk](mailto:simona.stokes@enablewellnessconsultancy.co.uk), to make a Subject Access Request (SAR). You can also ask for your information to be transferred to another provider of psychological services. We will respond to your request within 30 days. Verification of the identity of anyone making such a request will be required before information can be shared.

### **What if I believe the information you hold about me is incorrect?**

Whilst you are receiving services from Enable Wellness Consultancy, we will aim to keep the information we hold about you up-to-date. We would encourage you to tell us as soon as possible if your personal data changes so that we can update our records. You can also let us know if you believe the information we hold about you is inaccurate, needs amending or updating, by contacting our Data Protection Officer, Simona Stokes. We will aim to update your information within 72 hours.

### **How can I have my information removed?**

If you want to have your data removed we have to determine if we need to keep the data, for example in case HMRC wish to inspect our records or if in doing so we would breach our professional organisations data retention requirements (see above). If we decide that we should delete the data, we will do so without undue delay.

### **Protecting your Information**

Enable Wellness Consultancy is committed to keeping the information we hold about you secure. To protect your personal data, we follow the guidelines and recommendations in line with our professional bodies (The British Psychological Society and The Health Care Professionals Council) and regulatory bodies such as the Information Commissioners Office. More detailed information can be found in our Data Protection Policy, which complies with the requirements detailed in the Data Protection Act (1998) and the General Data Protection Regulations (2018). This document is available on request. We have physical, electronic, and operational procedures in place to protect your data. In the unlikely event of our security processes being compromised leading to a significant breach of your information, we will endeavour to inform you within 72 hours.

Our website uses cookies. A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Cookies to help a website owner to identify and track visitors and their website access preferences. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using this website

We will only collect the information needed so that we can provide you with the services you require, we do not sell or broker your data.

### **Confidentiality:**

The confidentiality of your personal information is very important to Enable Wellness Consultancy. All our services are confidential, and we will not share your information unless we judge that there is a serious risk of harm to yourself or others, or with your written consent, or when we are legally obliged to do so. Confidential information is restricted only to those who have a reasonable need to access it.

### **Who can I contact if I have concerns about my data management?**

Should you have any concerns about the management of your data by Enable Wellness Consultancy, please contact our Data Protection Officer, Simona Stokes, in the first instance. If we are unable to resolve your concerns, you have a right to complain to the Information Commissioner's Office: <https://ico.org.uk/for-the-public/raisingconcerns/>

**Policy prepared by:** Simona Stokes, Counselling Psychologist / Claire Dyson, Business Manager

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